

**Exhibit B**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

NEIMAN MARCUS GROUP LTD LLC, *et al.*,<sup>1</sup>

Reorganized Debtors.

)  
)  
) Chapter 11  
)  
) Case No. 20-32519 (DRJ)  
)  
) (Jointly Administered)  
)

**ORDER SUSTAINING LIQUIDATING TRUSTEE'S  
TWENTY-THIRD OMNIBUS OBJECTION TO CLAIMS (WAIVED CLAIMS)**

(Related Docket No. \_\_\_\_\_)

Upon the Objection<sup>2</sup> of the Liquidating Trustee seeking entry of an order (this "Order") (i) disallowing and expunging or (ii) allowing and reducing, as applicable, the claims identified on **Schedule 1** attached hereto, it is **HEREBY ORDERED THAT:**

1. The Objection is sustained as set forth herein.
2. Each claim identified on **Schedule 1** to this Order is (i) disallowed in its entirety or (ii) reduced and allowed, as set forth in **Schedule 1** to this Order.

<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Reorganized Debtors' service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Liquidating Trustee's Twenty-Third Omnibus Objection to Claims (Waived Claims)*.

3. Bankruptcy Management Solutions, Inc. d/b/a Stretto (“Stretto”) is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

4. Each claim and the objections by the Liquidating Trustee to each claim identified in **Schedule 1** constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each claim identified on **Schedule 1**.

5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity or such Debtor entity’s estate; (b) a waiver of any party’s right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Liquidating Trustee’s rights under the Bankruptcy Code or any other applicable law.

6. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

*[Remainder of Page Intentionally Left Blank]*

7. The Liquidating Trustee, Stretto, and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

8. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Date: \_\_\_\_\_, 2021

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THE HONORABLE DAVID R. JONES  
CHIEF UNITED STATES BANKRUPTCY  
JUDGE

**Schedule 1**

Ref #	Name of Claimant	Debtor Name	Schedule / Claim #	Date Filed	Claim Amount	Allowed Claim Amount	Reason for Objection
1	AKRIS, INC.	The Neiman Marcus Group LLC	2071	7/20/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$2,819,852.82 Total: \$2,819,852.82	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$1,263,000.00 Total: \$1,163,000.00	The Debtors are not fully liable as the claim has been partially waived pursuant to a critical vendor agreement
2	AKRIS, INC.	Bergdorf Goodman Inc.	2072	7/20/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$8,312.13 Total: \$8,312.13	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
3	CARVEN LUX PERFUMES INTL COSMETICS	The Neiman Marcus Group LLC	219777		Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$675,500.78 Total: \$675,500.78	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
4	Deva Inc	Bergdorf Goodman Inc.	1988	7/17/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$1,785.92 Total: \$1,785.92	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
5	FOUQUET TRADING LLC	Neiman Marcus Group LTD LLC	227	5/11/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$19,264.00 Total: \$19,264.00	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
6	INTERNATIONAL COSMETICS AND PERFUMES, INC	Neiman Marcus Group LTD LLC	852	5/26/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$362,426.83 Total: \$362,426.83	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
7	IRENE NEUWIRTH INC.	Bergdorf Goodman Inc.	2166	7/17/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$32,660.00 Total: \$32,660.00	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
8	MAISON EX NIHILO USA INC	Neiman Marcus Group LTD LLC	543	5/18/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$41,667.32 Total: \$41,667.32	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
9	STUART WEITZMAN INC	The Neiman Marcus Group LLC	221895		Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$2,551,687.64 Total: \$2,551,687.64	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
10	TOD'S S.P.A.	The Neiman Marcus Group LLC	1760	7/17/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$416,504.50 Total: \$416,504.50	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement
11	TOD'S S.P.A.	Bergdorf Goodman Inc.	1762	7/17/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$250,145.21 Total: \$250,145.21	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	The Debtors are not liable because the claim has been waived pursuant to a critical vendor agreement

Ref #	Name of Claimant	Debtor Name	Schedule / Claim #	Date Filed	Claim Amount	Allowed Claim Amount	Reason for Objection
12	TORY BURCH LLC	The Neiman Marcus Group LLC	1992	7/20/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$1,983,443.34  Total: \$1,983,443.34	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$786,795.00  Total: \$786,795.00	The Debtors are not fully liable as the claim has been partially waived pursuant to a critical vendor agreement